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Notice of Relatedness under Local Civil Rule 13

July 10, 2014

Via ECF

Honorable Joanna Seybert, U.S.D. J.
Eastern District of New York
100 Federal Plaza
Central Islip New York 11722

Via Fax: 718-613-2516

Honorable Pamela K. Chen, U.S.D. J.
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Linda Campbell-Hicks v. C. Tech Collection, Inc.*, No. 14-CV-3576 (JS)(WDW)
Jennifer Babcock v. C. Tech Collection, Inc., et al., No. 14-CV-3124 (PKC)(MDG)

Dear Judges Seybert and Chen:

My office, together with co-counsel, Joseph Mauro, Esq., represents Linda Campbell-Hicks, the plaintiff in one of two virtually identical class actions pending in this District against C. Tech Collection, Inc., under the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692, *et seq.* This case has been pending before Judge Seybert since it was filed on June 6, 2014.

The other class action, filed by another set of attorneys in the name of Jennifer Babcock, has been pending before Judge Chen since it was filed on May 19, 2014. (Although the parties in *Babcock* have consented to the jurisdiction of Magistrate Judge Go, ECF# 16, the Court has not yet "So Ordered" the form. Accordingly, I am directing this letter to Judge Chen.)

Essentially, Campbell-Hicks and Babcock seek to represent New York consumers who, within one year of each complaint being filed, were sent letters by C. Tech Collection, Inc. in which C. Tech sought to collect a \$3.00 “convenience fee” for acceptance of payment by credit card. Both plaintiffs received the same letter. Therefore, in pursuing their respective cases, the plaintiffs are undoubtedly going to rely on the same recent Decision and Order by Judge Kuntz in *Quinteros v. MBI Associates, Inc.*, No. 12-CV-2517(WFK)(SMG), 2014 WL 793138 (E.D.N.Y. Feb. 28, 2014), holding that attempting to collect such fees violates the FDCPA.

Because of the overlap of 11 out of 12 months in the class periods for each case, it would appear to make sense to transfer the case with the higher docket number, *Campbell-Hicks*, to be coordinated with the case bearing the lower docket number, *Babcock*. Accordingly, under Local Civil Rule 13, Campbell-Hicks respectfully requests that her case be so transferred.

Finally, if Judge Go will allow, I plan on attending the initial conference presently scheduled for August 1, 2014 on the Babcock case.

Respectfully,

/s/ Brian L. Bromberg

Brian L. Bromberg

cc: Honorable William D. Wall (Via ECF)
Honorable Marilyn Dolan Go (Via Fax: 718-613-2555)
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